

AGENCY OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WATERSHED MANAGEMENT DIVISION
1 NATIONAL LIFE DRIVE
MONTPELIER, VERMONT 05620-3522

FACT SHEET
(November 2012)

PERMIT TO DISCHARGE TO A MUNICIPAL WASTEWATER TREATMENT FACILITY

FILE NO.: 13-02
PERMIT NO.: 3-1490
PROJECT ID NO.: NS84-0023.01

NAME AND ADDRESS OF APPLICANT:

GSP Coatings, Inc.
101 John Seitz Drive
Exit 1 Industrial Park
Brattleboro, VT 05301

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

GSP Coatings, Inc.
101 John Seitz Drive
Exit 1 Industrial Park
Brattleboro, VT 05301

MUNICIPAL WASTEWATER TREATMENT FACILITY:

Brattleboro Wastewater Treatment Facility
Brattleboro, Vermont

I. Proposed Action, Type of Facility, and Discharge Location

The above named applicant applied on September 14, 2012 to the Vermont Department of Environmental Conservation to amend an existing pretreatment discharge permit which authorizes the discharge of metal finishing (coating) process wastewater into the designated municipal wastewater treatment facility. The facility is engaged in metal coating (finishing). The discharge is from the process wastewater treatment system, following metals precipitation and clarification to the municipal sewer line.

II. Description of Discharge

A quantitative description of the discharge in terms of significant effluent parameters is based upon State and Federal laws and regulations.

III. Limitations and Conditions

The effluent limitations of the draft permit, the monitoring requirements, and any implementation schedule (if required), may be found on the following pages of the permit:

Effluent Limitations Page 2 of 13
Monitoring Requirements Page 2 of 13

IV. Permit Basis and Explanation of Effluent Limitation Derivation

GSP Coatings, Inc. operates a metal coating process in the Exit One Industrial Park. The coating process entails using aluminum as a base metal with either nickel or chromium coating.

In accordance with federal regulations under 40 CFR part 433 - Metal Finishing Point Source Category, the permit contains effluent limits for total cadmium, total chromium, total copper, total lead, total nickel, total silver, total zinc, total cyanide and total toxic organics (TTO). Composite samples are collected proportional to flow from the discharge.

The current permit contains a flow limitation of 6,000 gpd, monthly average. On September 14, 2012, the permittee applied for a request to increase the flow limitation to 12,000 gpd, monthly average, to accommodate increased production.

Effluent monitoring for total chromium and total nickel is required twice per month and the effluent limitations are based on 40 CFR Part 433.17, Pretreatment Standards for New Sources.

Effluent monitoring for total cadmium, total lead, total silver, total zinc, total cyanide and TTO, which are not used in the production process, is required twice per year. The effluent limitations for these parameters are based on 40 CFR Part 433.17, Pretreatment Standards for New Sources. 40 CFR Part 433.17, Pretreatment Standards for New Sources, and includes a limit of 2.13 mg/l for total toxic organics (TTO).

In lieu of routine TTO monitoring, section 433.12 allows the permittee to submit a solvent management plan and certify with each monthly report that toxic organics have not entered the waste stream. A solvent management plan has been submitted and the permittee is certifying that the plan is being implemented and followed.

Effluent monitoring for total copper is required quarterly. The total copper effluent limitation is based on a concentration that will not cause an increase in the copper concentration in the Brattleboro Wastewater Treatment Facility's sludge.

The pH limitation is between 5.0 and 9.5 Standard Units in accordance with the Brattleboro sewer use ordinance.